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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.
ABRAMS IN SUPPORT OF OPPOSITION
TO DEFENDANTS' MOTION TO
DISMISS CASES FOR FAILURE TO
COMPLY WITH PTO 10**

This Document Relates to:

Jessi Watt v. Uber Technologies, Inc., et al;
3:25-cv-04704-CRB

C.M. v. Uber Technologies, Inc., et al; 3:24-cv-
05182-CRB

I, Rachel B. Abrams, declare:

1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein:

Watt:

2. On December 21, 2024, Plaintiff Watt retained Peiffer Wolf as legal counsel.

3. After communicating with Plaintiff, on June 4, 2025, Plaintiff's case was filed in the MDL. See *Jessi Watt v. Uber Technologies, Inc. et al*, 3:25-cv-04704-CRB (N.D. Cal. June 4, 2025). Plaintiff was notified of her of her discovery obligations and Plaintiff Fact Sheet requirements.
4. Peiffer Wolf submitted Plaintiff's Uber Ride Information Form and Plaintiff Fact Sheet with the information provided by Plaintiff. See *MDL Centrality Doc IDs 104797 and 123569 respectively; amended at Doc IDs 163724 and 143500 respectively*.
5. On July 17, 2025, Uber's counsel informed our firm of alleged deficiencies with Plaintiff's discovery. See *MDL Centrality Doc ID 130418*.
6. Between July 17, 2025 through the present, Plaintiff received numerous emails, text messages, telephone calls, voice messages, and letters requesting that she contact our office or provide requested information. These communications included fifteen (15) unsuccessful phone calls with voice messages, six (6) text messages, nine (9) e-mails, and one (1) letter sent by mail. In these communications, we repeatedly explained the need for her continued participation in the case, the risk that her case may be dismissed, and that we would need to withdraw as counsel if she did not contact our office.
7. On September 16, 2025, we sent Plaintiff a letter by U.S. certified mail explaining that if she did not contact our firm by September 25, 2025, we would have no choice but to withdraw as counsel.
8. On December 3, 2025, Counsel sent notice to Defendants of our intent to withdraw from representation of Plaintiff Watt.
9. On December 5, 2025, Counsel filed a Motion to Withdraw as Counsel for Plaintiff Watt which is pending before this Court. See *Docket No. 4573*.
10. Regardless of the pending Motion to Dismiss, Counsel continues to exhaust all possible avenues of outreach to advise Watt of this Motion to Dismiss.

C.M.:

11. Plaintiff C.M. has diligently produced all of the discovery documents within her possession.

1 12. Plaintiff C.M. states in Question 20 that she changed her phone number shortly after the
2 incident. This is a clear and sufficient response explaining why these text messages no longer
3 exist.

4 13. Counsel met and conferred with Defendants on December 5, 2025. There, Plaintiffs
5 reiterated our position that this was not a material deficiency, and that the text messages at
6 issue are no longer exist.

7 14. On December 19, 2025, Plaintiffs received correspondence from Defendants
8 memorializing the December 5th meet and confer and clarifying their position on certain
9 issues. That same day, on December 19, 2025, Defendants filed this Motion to Dismiss. See
10 *Docket Number 4737*.

11 15. Executed this day of December 31, 2025 in San Francisco, California.

12 /s/ Rachel B. Abrams
13 Rachel B. Abrams

14 *Counsel for Plaintiff*
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